

89819-1

8/22/2014

118



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

AUG 22 2014

OFFICE OF
CHEMICAL SAFETY
AND POLLUTION PREVENTION

Mr. Micah T. Reynolds
Oregon Global Distribution, Inc.
(d/b/a NPK Industries)
1600Skypark Drive, Suite 212
Medford, Oregon 97504

Subject: Label Notification(s) for Pesticide Registration 98-10

Dear Mr. Reynolds

Subject: Notification to Make Label Changes
EPA Registration Number: 89819-1
Date of Submission: July 21, 2014
Decision: 493572


The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated July 18, 2014 for the product Synergy. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action(s) requested fall within the scope of PRN 98-10. The label submitted with the application has (have been stamped "Notification" and will be placed in our records.

If you have any questions, please contact Melody Banks on 703 305-5413 or via e-mail at banks.melody@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard L Gebken".

Richard Gebken
Product Manager
Insecticide Branch
Registration Division (7504P)

	United States Environmental Protection Agency Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number
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Application for Pesticide – Section I

1. Company/Product Number 89819-1	2. EPA Product Manager Richard Gebken	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Synergy	PM# 10	
5. Name And Address Of Applicant (Include ZIP Code) Oregon Global Distribution, Inc. (d/b/a NPK Industries) 1600 Skypark Drive, Suite 212 Medford, Oregon 97504	6. Expedited Review. In NOTIFICATION Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: AUG 22 2014 EPA Reg. No. _____ Product Name _____	

Check if this is a new address

Section II

<input type="checkbox"/> Amendment – Explain below.	<input type="checkbox"/> Final Printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification – Explain below.	<input type="checkbox"/> Other – Explain Below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

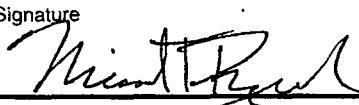
Submission of Label Notification to add optional label statements to promote proper product use.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA. Please confirm receipt with Micah Reynolds: mreynolds@tsgusa.com, via phone (202) 828-8967, or via fax (202) 872-0745.

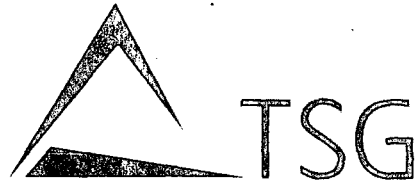
Section III

1. Material This Product Will Be Packaged In:				2. Type of Container							
Child Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____								
* Certification must be submitted		<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td>If "Yes"</td> <td>No. per</td> <td>If "Yes"</td> <td>No. per</td> </tr> <tr> <td>Unit Packaging wgt.</td> <td>Container</td> <td>Unit Packaging wgt.</td> <td>Container</td> </tr> </table>				If "Yes"	No. per	If "Yes"	No. per	Unit Packaging wgt.	Container
If "Yes"	No. per	If "Yes"	No. per								
Unit Packaging wgt.	Container	Unit Packaging wgt.	Container								
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(S) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product							
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithographed <input type="checkbox"/> Other _____ <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled											

Section IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Micah T. Reynolds, Technology Sciences Group, Inc.	Title Senior Regulatory Consultant	Telephone No. (Include Area Code) (202) 828-8967
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 		
3. Title Regulatory Consultant to Oregon Global Distribution, Inc.		
4. Typed Name Micah T. Reynolds		5. Date July 21, 2014

Technology Sciences Group Inc.
1150 18th Street, Suite 1000
Washington, DC 20036
Direct: (202) 828-8967
Fax: (202) 872-0745
E-Mail: MReynolds@TSGUSA.com



Micah T. Reynolds
Senior Regulatory Consultant

July 21, 2014

Oregon Global Distribution, Inc.
Submission of Label Notification for
Synergy; EPA Reg. No. 89819-1

Mr. Richard Gebken, PM-10
Registration Division (7505P)
Document Processing Center (NOTIF)
Office of Pesticide Programs
U.S. Environmental Protection Agency
One Potomac Yard, Room S-4900
2777 South Crystal Drive
Arlington, Virginia 22202

Dear Mr. Gebken:

Technology Sciences Group, Inc. (TSG), on behalf of Oregon Global Distribution, Inc., is submitting the enclosed label notification for the above referenced product to add optional statements "Shake Well", "Do Not Dilute", and "Ready to Use" in order to promote proper product use. In addition, since this product underwent a transfer from NPK LLC to Oregon Global Distribution, Inc. in 2013, the EPA Reg. No. and registrant information have been updated in the enclosed label version.

Please find enclosed the following in support of this notification:

- 1) EPA Notification Form (EPA Form 8570-1);
- 2) One redline copy of the proposed label with changes indicated;
- 3) ~~Three~~ ^{one} (1) clean copies of the proposed label.

If you have any questions or require additional information, please do not hesitate to contact me by phone at (202) 828-8967 or via e-mail at mreynolds@TSGUSA.com.

Sincerely,

Regulatory Consultant to
Oregon Global Distribution, Inc.

Enclosures

CC: R. Townsend (Oregon Global Distribution, Inc.)

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(Note to Reviewer: [bracketed text] is optional or alternate wording; (parenthetical text) is informational.)

(MASTER LABEL)

Synergy

(Alternate Brand Names: Synergy – Flower, Fruit & Vegetable Insect Killer; Synergy Spider Mite Killer; Spider Mite Killer, PROMIS Spider Mite Killer)

For use in home gardens, indoor houseplants, and greenhouses.

Active Ingredients

Pyrethrins.....	0.0075%
Canola Oil.....	1.3500%
Other Ingredients.....	98.6425%
Total	100.0000%

This product contains 0.1112 lbs. of canola oil and 0.0006 lbs. of pyrethrins per gallon.

CAUTION KEEP OUT OF REACH OF CHILDREN

FIRST AID	
IF SWALLOWED	Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to by a poison control center or doctor. Do not give anything by mouth to an unconscious person.
IF ON SKIN OR CLOTHING:	Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For additional information on this product (including health concerns, medical emergencies or pesticide incidents), you may call the National Pesticides Information Center at 1-800-858-7378, 6:30 AM to 4:30 PM Pacific Time (PT), seven days a week. During other times, call the poison control center 1-800-222-1222.	

See [back] [other] [side] [panel] for additional precautionary statements.

Manufactured for:
Oregon Global Distribution, Inc.
1600 Skypark Drive, Suite 212
Medford, OR 97504

EPA Reg. No. 89819-1
EPA Est. No. _____

Net Contents:

Batch No. (Note to reviewer: the lot or batch number may also be stamped directly on the product container.)

(Note to Reviewer: [bracketed text] is optional or alternate wording; (parenthetical text) is informational.)

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals: CAUTION: Harmful if absorbed through skin. Harmful if swallowed. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

- | |
|---|
| <p>User Safety Recommendations</p> <ul style="list-style-type: none"> • Users should wash hands with plenty of soap and water before eating, drinking, chewing gum, using tobacco, or using the toilet. • Users should remove clothing immediately if pesticide gets inside, then wash thoroughly and put on clean clothing. |
|---|

Environmental Hazards

This product is toxic to aquatic organisms including fish and invertebrates. To protect the environment do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters, or surface waters. Applying this product in calm weather when rain is not predicted for the next 24 hours will help to ensure that wind or rain does not blow or wash pesticide off the treatment area. Rinsing application equipment over the treated area will help avoid runoff to water bodies or drainage systems. This product is highly toxic to bees exposed to direct treatment on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds while bees are actively visiting the treatment area.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

For use in home gardens, indoor houseplants, and greenhouses. Read entire label. Use only as directed. Shake well before each use. Thoroughly wet all parts of the plants. Do not wet plants to point of runoff or drip.

USE RESTRICTIONS

- Do not allow adults, children, or pets to enter the treated area until sprays have dried.
- Do not apply this product in a way that will contact adults, children, or pets, either directly or through drift.
- Remove pets, birds, and cover fish aquariums before spraying.
- Do not use Synergy spray when temperatures are above 90°F.
- Do not apply more than 1 time per day.
- Do not apply within 21 days of a sulfur application.
- Do not apply more than 10 times per season.
- Not for use in outdoor residential misting systems.

(Note to Reviewer: [bracketed text] is optional or alternate wording; (parenthetical text) is informational.)

- Do not apply directly to or near water, storm drains, or drainage ditches. Do not apply when windy. To prevent product run-off, do not over water treated area(s) or apply prior to heavy rainfall.

Phytotoxicity: Oil removes the glaucous (blue) bloom from such evergreens as Colorado blue spruce and Koster spruce. Apply carefully to blooms and buds and on oil sensitive plants such as: Chamaecyparis, Cryptomeria, Japanese Holly, Red Cedar, and Smoke Tree. If concerned about sensitivity of plants, test by spraying a portion of the plant and wait several days to determine if burn occurs before spraying larger areas.

PESTS/SITES AND APPLICATION INSTRUCTIONS

[Synergy will kill] [Kills] [adelgids], [ants (except Fire Ants, Harvester Ants, Carpenter Ants, and Pharaoh Ants)], [exposed aphids], [apple red bugs], [beetles (blister beetle, Colorado potato beetle, flea beetle, Japanese beetle, asparagus beetle, Mexican bean beetle, spotted cucumber beetle, flea beetle)], [cabbage loopers], [caterpillars (gypsy moth caterpillars, tent caterpillar, diamondback moth larvae, leafrollers)], [centipedes], [earwigs], [fruittree leafrollers], [fungus gnats], [grape phylloxera], [grubs], [harlequin bugs], [lace bugs], [leafhoppers], [leafminers], [Lygus bugs], [mealybugs], [midges], [millipedes], [moths], [pear psylla], [pillbugs], [phylloxera], [psyllids], [plant bugs], [scale], [sawfly larvae], [silverfish], [sowbugs], [spider mites], [spittlebugs], [springtails], [stinkbugs], [thrips], [whitefly adelgids], [whiteflies], [weevils], [worms (cankerworms, cabbage worms, webworms)], [and eggs of listed insects]

OUTDOOR USE

For use outdoors on [fruit and nut trees (apples, cherries, peaches, nectarines, plums, pears, nuts)]; [flowering, foliage, and bedding plants]; [corn]; [melons]; [tomatoes]; [vegetables (beans, cabbage, cucurbits, peas, potatoes, lettuce, lima beans)]; [figs]; [small fruits (grapes, strawberry, raspberry)]; [citrus]; [ornamental plants and shade trees (birch, evergreens, holly, oak)]. Do not apply more than 2.5 gal. per 100 square feet per application. Do not reapply within 3 days except under extreme pest pressure. In case of extreme pest pressure do not reapply within 24 hours.

HOME GREENHOUSE USE

For use in home greenhouses on [fruit and nut trees (apples, cherries, peaches, nectarines, plums, pears, nuts)]; [flowering, foliage, and bedding plants]; [corn]; [melons]; [tomatoes]; [vegetables (beans, cabbage, cucurbits, peas, potatoes, lettuce, lima beans)]; [figs]; [small fruits (grapes, strawberry, raspberry)]; [citrus]; [ornamental plants and shade trees (birch, evergreens, holly, oak)]. Do not apply more than 32 oz. per 100 square feet per application. Do not reapply within 3 days except under extreme pest pressure. In case of extreme pest pressure do not reapply within 24 hours.

INDOOR USE

For use indoors on houseplants.

DORMANT USE

(Note to Reviewer: [bracketed text] is optional or alternate wording; (parenthetical text) is informational.)

Kills exposed egg stages of listed pests present in dormant season and scale insects, spider mites and mealybugs on dormant shrubs (roses), evergreens, fruit trees, and shade trees. Thoroughly wet the dormant plants or trees.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal.

(Note to reviewer: The following statements for residential use containers ≤5 gal.)

STORAGE: Store this product in its original container and keep in a secure storage area out of reach of children and domestic animals.

DISPOSAL: Nonrefillable container. Do not reuse or refill this container. **If empty:** Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

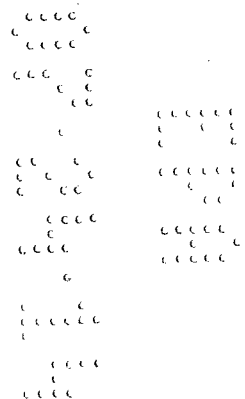
(Note to reviewer: The following statements for containers >5 gal. This product is non-dilutable.)

PESTICIDE STORAGE: Store this product in its original container and keep in a secure storage area out of reach of children and domestic animals.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

CONTAINER HANDLING: Nonrefillable container. Do not reuse or refill this container. Triple rinse (or equivalent) promptly after emptying. Then offer for recycling if available or reconditioning if appropriate or puncture and dispose of in a sanitary landfill or by incineration.

[Notice to Buyer: To the extent consistent with applicable law, buyer assumes all responsibility for safety and use not in accordance with label directions.]



(Note to Reviewer: [bracketed text] is optional or alternate wording; (parenthetical text) is informational.)

Optional Marketing claims, pictograms, and product information
(May be presented on the container or supplemental labeling)

- For Homeowner use
- Fast acting
- Dormant and growing season insect spray to kill exposed adelgids, aphids, armored scale, beetle larvae, cankerworms, caterpillars, fungus gnats, lace bugs, leafhoppers, leafminers, leafrollers, mealybugs, plant bugs, psyllids, scale insects, spider mites, thrips, webworms and whiteflies.
- Kills Japanese Beetles
- Kills all accessible stages of listed [crawling] [and] [flying] insects [including eggs].
- Kills all accessible stages of listed insects [including eggs].
- Kills all accessible stages of spider mites [including eggs].
- Kills by contact insecticide, ovicide.
- Kills spider mites, whiteflies, aphids, and all accessible stages of listed insects and eggs
- For roses, flowers, and vegetables
- Contains pyrethrins and canola oil
- For use on plants – indoors and outdoors
- Can use on [flowers], [vegetables], [fruits], and [roses]
- Easy to use
- Insecticide/Miticide
- Insect spray
- [Use on] Roses and flowers
- [Use on] Houseplants and gardens
- [Use on] Fruits and vegetables
- Synergy kills listed [insect] pests by contact.
- Kills by contact
- For best results, pests must be contacted directly with spray
- Kills listed insects by contact
- Kills listed bugs by contact
- Read entire container label before using this product
- Questions, Comments Call XXX-XXX-XXXX
- Made in USA
- (Insert company website)
- Some floors may be slippery after spraying
- Ready to Use
- Do Not Dilute
- Shake Well

